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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

WOODLAWN FOUNDATION,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No. 06-3113-CRB

**PARTIES' STIPULATED
 REQUEST TO EXTEND
 DEADLINE TO RESPOND TO
 COMPLAINT AND TO
 CONTINUE CASE MANAGEMENT
 CONFERENCE AND ~~PROPOSED~~
ORDER**

**IT IS HEREBY STIPULATED AND AGREED AND RESPECTFULLY
 REQUESTED** by and between the parties to this action, as reflected by the signatures of their
 respective counsel as set forth below, that the deadline to respond to the complaint is extended
 from July 17, 2006 to August 14, 2006, and the case management conference currently set for
 August 18, 2006, at 8:30 a.m. be continued to September 8, 2006 at 8:30 a.m. The grounds for
 this stipulated request are:

1. The Internal Revenue Service has requested additional time to obtain its
 administrative records in this case. The requested records are necessary to meaningfully respond
 to the allegations set forth in the complaint.

2. The case management conference currently scheduled for August 18, 2006.
 Counsel for the United States has two court appearances scheduled on that date, at the same time.
 Rescheduling the case management conference to September 8, 2006 would allow counsel for the

United States to appear at both.

Accordingly, the parties respectfully request that the Court continue the deadline to respond to the complaint to August 14, 2006 and to continue the case management conference to September 8, 2005, at 8:30 a.m.

Respectfully submitted,

CARR, McClellan, INGERSOLL,
THOMPSON & HORN

Dated: July 6, 2006

/s/ Lage Anderson
LAGE ANDERSON
Attorney for Plaintiff

KEVIN V. RYAN
United States Attorney

Dated: July 6, 2006

By: /s/ Cynthia Stier
CYNTHIA STIER
Assistant United States Attorney
Attorneys for the United States of America

ORDER

Pursuant to the Stipulation of the parties as set forth above, and for good cause shown,
IT IS HEREBY ORDERED that the deadline to respond to the complaint is extended from July 17, 2006 to August 14, 2006.

IT IS FURTHER HEREBY ORDERED that the case management conference date currently scheduled for August 18, 2006, at 8:30 a.m. is continued to September 8, 2006, at 8:30 a.m.

Dated: July 7, 2006

THE HONORABLE CLERK
UNITED STATES DISTRICT COURT

